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Attorneys for Petitioner  
**CASIMIRO JOSE CANHA CAVACO DIAS**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

In the Matter of I.D., N.D., and C.D.:

Case No. 3:24-cv-04471-EMC

CASIMIRO JOSE CANHA CAVACO DIAS,

**MOTION TO REPLACE ECF. 121 – 4  
WITH A REDACTED VERSION**

Petitioner,

**DATE: OCT. 29-31, NOV. 4, 2024  
CTRM: 5  
JUDGE: HON. EDWARD M. CHEN**

and

# RULA NABIL KHOURY CAVACO DIAS

## Respondent.

Respondent.

Petitioner, CASIMIRO JOSE CANHA CAVACO DIAS (“Petitioner”), by and through his undersigned counsel, respectfully moves this Court for an order allowing Petitioner to file a redacted version of ECF 121 – 4 to replace the unredacted version to safeguard the identity of the subject Children.

1     **I. INTRODUCTION**

2                 Petitioner respectfully requests that this Court permits the filing of a replacement for ECF  
3 No. 121-4 with a redacted version. Subsequent to several productive meet-and-confer sessions,  
4 counsel successfully prepared a joint conference statement in accordance with the Court's  
5 amended case management order [ECF No. 90]. As part of the witness list, the Court directed the  
6 parties to include, as exhibits, any expert reports along with the expert's CVs. Petitioner  
7 inadvertently provided Respondent, who had agreed to file the joint statement and corresponding  
8 exhibits, with the unredacted version of Petitioner's Armenian expert report. Petitioner only  
9 realized after the filing that the children's names were disclosed. Petitioner, through this motion,  
10 hopes to replace ECF No. 121-4 with the redacted version that was originally intended to be sent  
11 to Respondent.

12     **II. BACKGROUND**

13                 On September 16, 2024, the Court ordered the parties to submit a joint pretrial conference  
14 statement. [ECF No. 90]. On October 9, 2024, Petitioner and Respondent finalized and submitted  
15 a pre-trial joint conference statement to the Court. On October 10, 2024, Petitioner contacted the  
16 ECF Help Desk of the United States District Court of the Northern District of California to seek  
17 assistance on how to replace the unredacted version with a redacted version. With the approval  
18 and consent of Respondent, the ECF Help Desk temporarily locked ECF No. 121-4. Through this  
19 motion, Petitioner requests that the Court allow the replacement of ECF No. 121-4 with a redacted  
20 version. Prior to filing, on October 9<sup>th</sup>, Petitioner inadvertently provided Respondent with the  
21 unredacted version of Petitioner's Armenian expert report. After filing, Petitioner discovered that  
22 the children's names were not covered. Petitioner now seeks to replace the unredacted document  
23 with the intended redacted version to safeguard the identity of the Children.

24     **III. CONCLUSION AND RELIEF SOUGHT**

25                 Petitioner respectfully requests that the Court grant Petitioner's request to replace ECF  
26 No. 121-4 with a redacted version. Petitioner also respectfully requests that the Court orders the  
27 permanent removal of ECF No. 121-4 and grant leave to Petitioner to file a redacted version in  
28

1 its place.

2  
3 Dated: October 11, 2024

4 Respectfully submitted,

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